

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA, )

Plaintiff, )

vs. )

MAURICE L. FULLER )

Defendant. )

CASE NUMBER: 22-mj-7028-MAB

**FILED UNDER SEAL**

**CRIMINAL COMPLAINT**

I, Christopher Stanley, the undersigned complainant being duly sworn state the following  
is true and correct to the best of my knowledge and belief:

**COUNT 1**

**FELON IN POSSESSION OF A FIREARM**

On or about January 23, 2022, in St. Clair County, within the Southern District of Illinois,  
and elsewhere,

**MAURICE L. FULLER,**

defendant herein, knowing that he had been previously convicted of a crime punishable by  
imprisonment for a term exceeding one year, did knowingly and intentionally possess a firearm,  
that is: a Tisas Zigana, model: PX-9, semi-automatic pistol, serial number: T062020BM16626,  
said firearm having been shipped and transported in interstate commerce, all in violation of Title  
18, United States Code, Sections 922(g)(1) and 924(a)(2).

**AFFIDAVIT**

1. As an ATF Special Agent, I investigate violations of federal and state firearms laws and other crimes involving the use, possession and trafficking of firearms, including violent crime and drug crime. I began employment with ATF in 2014.

2. I have been a law enforcement officer for approximately 17 years. From 2004-2014, I was employed as police officer with the Swansea Police Department. As a detective in Swansea, I investigated a wide variety of criminal offenses, including offenses involving homicide, stolen property, fraud, controlled substance and firearms. I was a member of the Major Case Squad of the Greater St. Louis Metropolitan Area. I am familiar with, and use, the following methods of investigation: undercover operations, the use of informants and other sources of information, interviews of individuals involved in, or witnesses to, criminal activity, search and seizure warrants, and physical, visual and electronic surveillance.

3. I received training at the Federal Law Enforcement Training Center and the ATF National Academy prior to beginning employment with ATF. Prior to that I received training through the State of Illinois to serve as an Illinois Police Officer with the Swansea Police Department.

4. The statements contained in this affidavit are based on the investigation of your Affiant, as well as information derived from reports and interviews of the law enforcement officers and witnesses named herein. In support of this Complaint, your Affiant states as follows:

5. On January 23, 2022, members of the East St. Louis Police Department and the Illinois State Police Public Safety Enforcement Group (“PSEG”) were called to a homicide outside of 706 North 68<sup>th</sup> Street, East St. Louis, Illinois, which is the residence of Maurice L. Fuller.

6. Witnesses on scene advised that Fuller was seen holding a handgun shortly after the homicide. Sgt. Dan Menke, PSEG, asked Fuller if he would grant permission to search his residence for illegal contraband. Fuller signed a consent to search form.

7. During the search, Sgt. Menke located an empty 30 round extended magazine in the living room. Downstairs in the basement, he located two gun boxes with no guns located inside. Upstairs in a bedroom, Sgt. Menke located a small red bag containing .22 caliber ammunition and 9mm ammunition.

8. As Sgt. Menke exited the residence to ask Fuller about the ammunition found in his house, he overheard Fuller admit to Inspector Nick Manns that he had taken his gun over to a neighbor’s house. Fuller stated the gun was a handgun and it was located in a backpack with some cannabis.

9. Agents asked Fuller if he would give them permission to retrieve the gun from his neighbor. Fuller agreed. Fuller’s neighbor gave permission for agents to go into his residence and stated the backpack was in a closet on the east side of the house.

10. Agents located a backpack in a closet that contained a Tisas Zigana PX-9 pistol, serial number T062020BM16626 with a fully loaded magazine as well as approximately 97 grams of suspected cannabis.

11. Fuller was interviewed. He admitted possessing the firearm and regularly carried it in the backpack. He acknowledged he was a felon and should not have had the gun. He also

admitted to possessing the marijuana (approximately 2 – 3 ounces) with the intent to sell it, indicating that he estimated making \$200 per ounce.

12. The firearm identified in this report was manufactured outside the State of Illinois and/or travelled in interstate commerce and is a firearm as defined in Title 18 U.S.C., Chapter 44, Section 921(a)(3).

13. Fuller has been previously convicted of Aggravated Robbery in Franklin County, Ohio Case Number 09-CR-001373, wherein he was sentenced to seven years in the Ohio Department of Corrections.

FURTHER AFFIANT SAYETH NAUGHT.

CHRISTOPHER  
STANLEY

Digitally signed by CHRISTOPHER  
STANLEY  
Date: 2022.01.28 14:18:21 -06'00'

Christopher Stanley  
Special Agent  
Bureau of Alcohol, Tobacco, and Firearms

State of Illinois                    )  
  ) SS.  
County of St. Clair                )

Sworn to before me, and subscribed in my presence on the 28 day of January, 2022,  
at East St. Louis, Illinois.



MARK A. BEATTY  
United States Magistrate Judge

STEVEN D. WEINHOFET  
United States Attorney



LAURA V. REPERT  
Assistant United States Attorney